

Mr. J. Michael Milner  
Cambridge Industries, Inc. - Grabill Plant  
14123 Roth Road  
Grabill, IN 46741

Re: Minor Source Modification No:  
003-11770-00059

Dear Mr. Milner:

Cambridge Industries, Inc. - Grabill Plant applied for a Part 70 operating permit on May 29, 1996 for a high pressure fiberglass thermoset molding plant. An application to modify the source was received on January 12, 2000. Pursuant to 326 IAC 2-7-10.5(d)(5) the following emission units are approved for construction at the source:

Two (2) twenty-five hundred(2,500) tons high pressure fiberglass thermoset plastic molding Hebron presses, identified as PRV-2572 and PRV-2573, each press with a maximum molding capacity of four hundred and thirty-five(435) pounds of sheet molding compound(SMC) per hour, using no controls, and exhausting inside the building.

The proposed Minor Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). The source may begin operation upon issuance of the source modification approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Shantanu Pahi or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

Spahi

cc: File - Allen County  
U.S. EPA, Region V  
Allen County Health Department  
Air Compliance Section Inspector - Jennifer Schick  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT**

**Cambridge Industries, Inc. - Grabill Plant  
14123 Roth Road  
Grabill, Indiana 46741**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 003-11770-00059	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) ). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary high pressure fiberglass thermoset plastic molding plant.

Responsible Official: J. Michael Milner  
Source Address: 14123 Roth Road, Grabill, Indiana 46741  
Mailing Address: 14123 Roth Road, Grabill, Indiana 46741  
Phone Number: (219) 627-3612  
SIC Code: 3089  
County Location: Allen  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD or Emission Offset Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) Two (2) twenty-five hundred(2,500) tons high pressure fiberglass thermoset molding hebron presses, identified as PRV-2572 and PRV-2573, each press with a maximum molding capacity of four hundred and thirty-five(435) pounds of sheet molding compound(SMC) per hour, using no controls, and exhausting inside the building.

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B                      GENERAL CONSTRUCTION CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2      Definitions [326 IAC 2-7-1]**

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### **B.3      Effective Date of the Permit [IC13-15-5-3]**

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

### **B.4      Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.5      Phase Construction Time Frame**

That pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the IDEM may revoke this approval to construct if the:

- (a) Construction of the molding presses has not begun within eighteen (18) months from the effective date of this approval or if during the construction of molding presses, work is suspended for a continuous period of one (1) year or more.

The OAM may extend such time upon satisfactory showing that an extension, formally requested by the Permittee is justified.

### **B.6      BACT Determination for Phase Constructions**

That pursuant to 40 CFR 52.21(j)(4), for phase construction projects, the determination of BACT shall be reviewed and modified as appropriate at the latest reasonable time which occurs no later than eighteen (18) months prior to commencement of construction of each independent phase of the project.

## SECTION C GENERAL OPERATION CONDITIONS

### C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

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- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

### C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.
- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**C.4 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.5 Operation of Equipment [326 IAC 2-7-6(6)]**

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Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**Testing Requirements [326 IAC 2-7-6(1)]**

**C.6 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]**

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- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM,, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

**C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Compliance with applicable requirements shall be documented as required by this approval. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.8 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]**

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this approval;
  - (3) The Compliance Monitoring Requirements in Section D of this approval;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and



- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of :
  - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and
  - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.9 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency.

IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **C.10 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

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- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

#### **C.11 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:

- (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this approval;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

**C.12 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) The reports required by conditions in Section D of this approval shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- (c) Unless otherwise specified in this approval, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

## **SECTION D.1 FACILITY OPERATION CONDITIONS**

### **Facility Description [326 IAC 2-7-5(15)]**

- (a) Two (2) twenty-five hundred(2,500) tons high pressure fiberglass thermoset molding hebron presses, identified as PRV-2572 and PRV-2573, each press with a maximum molding capacity of four hundred and thirty-five(435) pounds of sheet molding compound(SMC) per hour, using no controls, and exhausting inside the building.

### **Emissions Limitations and Standards [326 IAC 2-7-5(1)]**

#### **D.1.1 Hazardous Air Pollutants [326 IAC 2-4.1-1]**

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control):

- (a) Use of resins, cleanup solvents, and other material containing hazardous air pollutants (HAP) shall be limited such that the potential to emit (PTE) HAP shall be less than ten (10) tons of any individual HAP and less than twenty-five (25) tons of any combination of HAP per twelve (12) consecutive months. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply. Compliance with this limit shall be determined based upon the following criteria:
- (1) Monthly usage by weight, HAP monomer content, method of application, and other emission reduction techniques for each resin shall be recorded.
  - (2) HAP emissions from each type of emitting material shall be calculated as follows:
    - (A) Closed Molding: multiply the usage of each resin by the HAP monomer content of each resin and by the emission factor for closed molding taken from EPA's AP-42 document. Any volatile HAP contained in the resin that is not monomer is assumed to be 100% emitted. After source testing has been performed and approved by IDEM, emissions will be calculated by multiplying the usage of each resin by the HAP monomer content of each resin and by the calculated emission factor.
    - (B) All other materials: all volatile HAP contained in the materials are assumed to be 100% emitted.

#### **D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

### **Compliance Determination Requirements**

#### **D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11][326 IAC 3-6]**

No later than 90 days after the issuance of this permit, the Permittee shall perform HAP emission testing using methods approved by the Commissioner. The emission factor determined by this testing will be used to calculate the HAP emissions as described in Condition D.1.1(a)(2)(A). In addition to these requirements, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. Testing shall be conducted in accordance with Section C- Performance Testing.

## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.1.4 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limits established in Condition D.1.1.
  - (1) The amount and HAP content of each resin and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the months of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total HAP usage for each month; and
  - (5) The weight of HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.1.5 Reporting Requirements**

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A quarterly summary of the information to document compliance with Conditions D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION  
CERTIFICATION**

Source Name: Cambridge Industries, Inc. - Grabill Plant  
Source Address: 14123 Roth Road, Grabill, Indiana 46741  
Mailing Address: 14123 Roth Road, Grabill, Indiana 46741  
Source Modification No.: 003-11770-00059

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Source Modification Quarterly Report**

Source Name: Cambridge Industries, Inc. - Grabill Plant  
Source Address: 14123 Roth Road, Grabill, Indiana 46741  
Mailing Address: 14123 Roth Road, Grabill, Indiana 46741  
Source Modification No.: 003-11770-00059  
Facility: Two(2) 2500 ton closed molding presses(PRV-2572 and PRV-2573)  
Parameter: Single HAP/ and all HAPs.  
Limit: 10 tons of single HAP per yr./25 tons of all HAPs per yr.

YEAR: \_\_\_\_\_

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 months		12 month total	
	HAP	HAPs	HAP	HAPs	HAP	HAPs
Month 1						
Month 2						
Month 3						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_



## **Indiana Department of Environmental Management Office of Air Management**

### **Technical Support Document (TSD) for a Part 70 Minor Source Modification.**

#### **Source Background and Description**

<b>Source Name:</b>	<b><i>Cambridge Industries, Inc. - Grabill Plant</i></b>
<b>Source Location:</b>	<b><i>14123 Roth Road, Grabill, Indiana 46741</i></b>
<b>County:</b>	<b><i>Allen</i></b>
<b>SIC Code:</b>	<b><i>3089</i></b>
<b>Operation Permit No.:</b>	<b><i>003-5942-00059</i></b>
<b>Operation Permit Issuance Date:</b>	<b><i>Not yet Issued</i></b>
<b>Minor Source Modification No.:</b>	<b><i>003-11770-00059</i></b>
<b>Permit Reviewer:</b>	<b><i>Spahi</i></b>

The Office of Air Management (OAM) has reviewed a modification application from Cambridge Industries, Inc. - Grabill Plant relating to the construction of the following emission units and pollution control devices:

- (a) Two (2) twenty-five hundred(2,500) tons high pressure fiberglass thermoset plastic molding Hebron presses, identified as PRV-2572 and PRV-2573, each press with a maximum molding capacity of four hundred and thirty-five(435) pounds of sheet molding compound(SMC) per hour, using no controls, and exhausting inside the building.

#### **History**

On January 12, 2000, Cambridge Industries, Inc. - Grabill Plant submitted an application to the OAM requesting to add additional SMC molding presses to their existing plant. Cambridge Industries, Inc. - Grabill Plant applied for a Part 70 permit on May 29, 1996, which is still pending.

#### **Enforcement Issue**

There are no enforcement actions pending.

#### **Recommendation**

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 12, 2000. Additional information was received on April 8, 2000.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (1 Page.)

### Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO <sub>2</sub>	0.0
VOC	14.86
CO	0.0
NO <sub>x</sub>	0.0

HAP's	Potential To Emit (tons/year)
Styrene	14.86
TOTAL	14.86

### Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(5) because this modification's potential to emit is limited to less than ten(10) tons per year of any single hazardous air pollutant and/or less than twenty-five(25) tons per year of any combination of hazardous air pollutants.

### County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Allen County has been classified as attainment or unclassifiable for VOCs. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	1.9
PM-10	1.9
SO <sub>2</sub>	0.0
VOC	474.00
CO	0.0
NO <sub>x</sub>	0.0

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon AIRS Facility Quick Look Report, updated Jan 22, 1999.

### Limited Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Molding Presses	0.0	0.0	0.0	< 10*	0.0	0.0	< 10**
Net Emissions	0.0	0.0	0.0	< 10*	0.0	0.0	< 10**
PSD Sig. Levels	25	15	40	40	100	40	-

Note: \* = styrene is the only VOC, so VOC is limited to 10 tons/yr for this modification, \*\* = styrene is the only HAP.

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

### **State Rule Applicability - Individual Facilities**

#### **326 IAC 2-4.1-1(MACT)**

Use of resins, cleanup solvents, and other material containing hazardous air pollutants (HAP) shall be limited such that the potential to emit (PTE) HAP shall be less than ten (10) tons of any individual HAP and less than twenty-five (25) tons of any combination of HAP per twelve (12) consecutive months. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.

#### **326 IAC 8-1-6(BACT)**

The potential to emit from this modification(adding molding presses) is less than twenty-five(25) tons of volatile organic compounds per year. Therefore, 326 IAC 8-1-6 does not apply.

### **Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 003-11770-00059.

**Potential to Emit of HAPs and VOCs from SMC Closed Molding Presses:**

Weight % of monomer(styrene) = 13 %

Production rate = 435 lbs/hr of SMC compound

Emission rate of styrene = 3%(non-vapor suppressed)

Number of presses = 2

Note: Emissions factors are taken from Table 4.4-2 of AP-42 Handbook, Fifth Edition, updated in January 1995.

**Potential to emit(PTE) of HAPs and VOC from the presses**

= weight % of monomer x production rate x emission rate x 8760 hr/yr x 1 ton / 2000 lbs x 2

= 0.13 lbs of styrene/lb of SMC compound x 435 lbs of SMC compound/hr x 0.03 lbs of  
styrene emitted/lb of styrene x 8760 hrs/yr x 1 ton/ 2000 lbs x 2

= 14.86 tons of styrene/yr

Potential to emit of HAPs = 14.86 tons of styrene/yr

Potential to emit of VOCs = 14.86 tons/yr